

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

JILL ALTMAN, individually and on behalf )  
of a class, )  
Plaintiff, ) Civil Action No.:  
vs. ) 1:15-cv-02451-SCJ-CMS  
WHITE HOUSE BLACK MARKET, INC., )  
and DOES 1-10, )  
Defendants. )

**DEFENDANT WHITE HOUSE BLACK MARKET, INC.'S MOTION TO  
FILE DECLARATION EXHIBITS UNDER SEAL**

Defendant, White House Black Market, Inc. ("WHBM"), files its Motion to File Declaration Exhibits Under Seal and requests leave to file under seal an unredacted version of an exhibit attached to its Declaration in Support of the Request to Maintain Documents under Seal (Docs. 66, 67). This motion is brought under the Stipulated Protective Order (¶ 7, Docs. 43, 44) and the Local Rules of this Court. In support of its Motion, WHBM states as follows:

1. In response to Plaintiff's written discovery in this case, WHBM produced and marked several interrogatory responses and documents

“Confidential” under the protective order entered by the Court (Doc. 44) because they contained proprietary or other confidential material.

2. On May 10, 2017, Plaintiff filed her motion for class certification (Docs. 63, 64) and attached these confidential materials in support thereof.

3. Plaintiff filed a motion to file these confidential materials under seal (Doc. 65) with the understanding that WHBM would provide a declaration by supplement to support the sealing of these materials.

4. WHBM has now filed the declaration of Nancy Holland in support of its request that its confidential material remain filed under seal.

5. Attached to its request are excerpts of its discovery responses that contain the confidential material.

6. For the same reasons set forth in the Holland Declaration, the exhibit to the Holland Declaration should remain under seal to protect the confidential material contained therein.

7. WHBM, therefore, moves the Court for an order granting this motion and permitting the filing of the exhibits to the Holland Declaration under seal.

8. A proposed order is submitted herewith.

WHEREFORE, WHBM requests that this motion be granted.

Respectfully submitted this 16th day of May, 2017.

KING & SPALDING LLP

/s/ J. Anthony Love

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**CERTIFICATE OF COMPLIANCE**

The undersigned certifies that 14-point Times New Roman was used for this document and that it has been formatted in compliance with Local Rule 5.1.

DATED: May 16, 2017.

*/s/ J. Anthony Love*  
J. Anthony Love

**CERTIFICATE OF SERVICE**

This is to certify that I have this day served a true and correct copy of the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following counsel of record:

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DATED: May 16, 2017.

/s/ J. Anthony Love  
J. Anthony Love